



EDWARD S. WEISFELNER
direct dial: (212) 209-4900
fax: (212) 938-2900
eweisfelner@brownrudnick.com

Seven
Times
Square
New York
New York
10036
tel 212.209.4800
fax 212.209.4801

July 23, 2015

VIA E-MAIL
AND ECF FILING

Honorable Jesse M. Furman
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

RE: *Ignition Switch Plaintiffs & Non-Ignition Switch Plaintiffs v. Motors Liquidation Company (In re Motors Liquidation Co., f/k/a General Motors Corp.), Case Nos. 15-CV-5056 (JMF) and 14-MD-2543 (JMF)*

Dear Judge Furman:

We write as Co-Designated Counsel for the Ignition Switch Plaintiffs and certain Non-Ignition Switch Plaintiffs, joined by Co-Designated Counsel for Ignition Switch Pre-Closing Accident Plaintiffs and Counsel for certain Non-Ignition Switch Pre-Closing Accident Plaintiffs, Counsel for the GUC Trust, Counsel for certain participating GUC Trust Unitholders, and Counsel for General Motors LLC ("New GM" and together with the above-referenced entities, the "Parties"),¹ to inform Your Honor that the Parties have agreed to toll part of the Omnibus Judgment Pleading for which the Ignition Switch Plaintiffs and certain Non-Ignition Switch Plaintiffs seek to withdraw the reference to the Bankruptcy Court.

On July 23, 2015, the Parties submitted to the Bankruptcy Court a Stipulation and Agreed Order (the "Stipulation"), seeking to toll, *inter alia*, that portion of the Omnibus Judgment Pleading that relates to the Non-Ignition Switch Plaintiffs' "GUC Trust Asset Pleading" (defined in the Bankruptcy Court's Judgment, dated June 1, 2015, as a pleading setting forth the Non-Ignition Switch Plaintiffs' "good faith basis" to believe that any of the GUC Trust Assets may be used to

¹ Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the *Motion to Withdraw the Reference for the Ignition Switch Plaintiffs' No Strike Pleading with Regard to the Second Amended Consolidated Complaint*; and the *Non-Ignition Switch Plaintiffs' (I) Objection Pleading with Regard to the Second Amended Complaint and (II) GUC Trust Asset Pleading*, dated June 24, 2015, entered June 29, 2015 [ECF No. 1] (the "Motion to Withdraw").

July 23, 2015
Page 2

satisfy late proofs of claim, if filed by them and ultimately allowed by the Bankruptcy Court). A copy of the executed Stipulation is attached hereto as Exhibit A.

The response deadline to the Motion to Withdraw is currently July 23, 2015. In accordance with the Stipulation, the Parties have agreed, subject to Your Honor's approval, that the portion of the Motion to Withdraw relating to the GUC Trust Asset Pleading is also presently tolled, subject to its continued prosecution on written notice to counsel for New GM, the GUC Trust, and the Unitholders; with any responses thereto due within seven (7) business days of such notice.

Respectfully submitted,

/s/ Edward S. Weisfelner

Edward S. Weisfelner
Howard S. Steel
BROWN RUDNICK LLP
7 Times Square
New York, NY 10036

*Designated Counsel for Ignition
Switch Plaintiffs and Certain Non-Ignition Switch
Plaintiffs*

/s/ William P. Weintraub

William P. Weintraub
Gregory W. Fox
GOODWIN PROCTOR LLP
The New York Times Bldg.
620 Eighth Avenue
New York, NY 10018

*Designated Counsel for Certain Ignition
Switch Pre-Closing Accident Plaintiffs and
Counsel for Certain Non-Ignition Switch
Pre-Closing Accident Plaintiffs*

/s/ Sander L. Esserman

Sander L. Esserman
STUTZMAN, BROMBERG, ESSERMAN &
PLIFKA
2323 Bryan Street, Suite 2200
Dallas, TX 75201

*Designated Counsel for Ignition
Switch Plaintiffs and Certain Non-Ignition Switch
Plaintiffs*

/s/ Arthur Steinberg

Arthur Steinberg
Scott Davidson
KING & SPALDING
1185 Avenue of the Americas
New York, NY 10036

Counsel for New GM



July 23, 2015
Page 3

/s/ Matthew Williams

Matthew Williams
Lisa H. Rubin
Keith R. Martorana
GIBSON, DUNN & CRUTCHER, LLP
200 Park Avenue
New York, New York 10166

*Counsel for Wilmington Trust Company, as GUC
Trust Administrator and Trustee*

/s/ Daniel Golden

Daniel Golden
Deborah J. Newman
Naomi Moss
AKIN, GUMP, STRAUSS, HAUER & FELD,
LLP
One Bryant Park
New York, New York 10036

Counsel for Participating GUC Trust Unitholders

cc: Steve W. Berman
Elizabeth J. Cabraser
Robert Hilliard
Richard C. Godfrey
Andrew B. Bloomer
Jonathan Flaxer

SO ORDERED:

Dated: July __, 2015
New York, New York

HONORABLE JESSE M. FURMAN
UNITED STATES DISTRICT JUDGE